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January 30, 2025

VIA ECF

The Honorable Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: Altaune Brown v. Frankie Shop LLC & Flemington Estates LLC; Case No. 1:24-cv-05688-VSB

Dear Judge Broderick:

Dentons US LLP represents Defendant Frankie Shop LLC ("Defendant") in the above-referenced matter. Together with counsel for Plaintiff and Defendant Flemington Estates LLC, we jointly and respectfully move this Court to stay all case deadlines in this action for forty-five days (45) days, from January 29, 2025 to March 17, 2025 (as March 15, 2025 falls on a Saturday).

The parties have agreed on the principal terms to resolve this matter and the requested stay will permit the parties to finalize said agreement. Once those efforts are complete, voluntary dismissal will be filed.

Respectfully submitted,

/s/ Mary Kate Brennan Mary Kate Brennan

All counsel of record (by ECF) CC: